



Philip A. Craig, Executive Director
An Affiliate of The American Beverage Licensees

December 3, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: DA 12-1863, IB Docket No. 12-340; RM-11683

Dear Ms. Dortch:

Thank you for the opportunity to submit comments in the proceedings relative to LightSquared's ongoing efforts to build out a new, competitive mobile broadband network. The Ohio Licensed Beverage Association is a state wide trade association representing the interest of both on and off premise permit holders in the State of Ohio. Our members range from areas in which broadband access is readily available to areas in which broadband is almost non-existent. To that end, our membership has a great deal of interest in opportunities that allow for greater business communication opportunities.

On behalf of the OLBA, we would like to add our support to the list of those interested in seeing the Commission approve the license modification application and take any other action necessary to kickstart the LightSquared network.

As small business owners, we are excited about the impact LightSquared's wholesale business model will have on America, especially in less-populated areas where connectivity is limited. Their model allows for greater competition, which we believe will lead to more innovation, better pricing for consumers and expansion into more areas of Ohio and the Nation. That's the basic philosophy embodied in the National Broadband Plan released a couple of years ago. It also seems to fit nicely with the tenor of the recent report from the President's Council of Advisors on Science and Technology (PCAST).

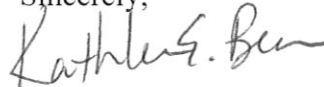
While we appreciate the Obama Administration and the FCC recognizing the spectrum issue facing our nation, we ask that the FCC move with greater speed. We all know that spectrum is finite and demand is skyrocketing, but we need all components of our federal government to approach spectrum sharing in a way that ultimately benefits all of our citizens. It is our understanding that LightSquared has made a good faith offer of giving up its rights to terrestrial use of the very spectrum that was alleged to have caused interference with GPS devices in exchange for a sharing agreement with the government. This seems more than fair given that

engineers from Spirent and ETS-Lindgren recently confirmed in an Inside GNSS article (“LTE, Positioning, and the Implications for GNSS Over-the-Air Testing”) the general acceptance that the issue was largely caused by the absence of design and testing standards for GPS devices akin to what cellular devices must undergo. It is also worth noting that there was unanimous agreement in review of the interference testing that took place last year that GPS functionality in cellular devices was not affected at all.

FCC Commissioner Robert McDowell recently noted that the federal government occupies about 60 percent of spectrum suitable for mobile broadband. LightSquared’s proposal to share a minute fraction of the government’s vast spectrum holdings to provide a nationwide wholesale LTE network is a great use of our country’s finite spectrum resources.

Thank you for moving as expeditiously as possible with your review; I very much appreciate your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen E. Bean". The signature is fluid and cursive, with the first name "Kathleen" being more prominent than the last name "Bean".

Kathleen E. Bean

cc: Sen. Sherrod Brown, U.S. Senate
Sen. Rob Portman, U.S. Senate
Speaker John Boehner, U.S. House of Representatives
Rep. Bob Latta, U.S. House of Representatives
Rep. Steve LaTourette, U.S. House of Representatives